

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

SEAN SMITH and CRYSTAL SMITH,

Plaintiffs,

v.

CSAA FIRE AND CASUALTY  
INSURANCE COMPANY and LISA  
HOLLIDAY,

Defendants.

Case No: 5:17-cv-01302-D

**PLAINTIFFS' FINAL EXHIBIT LIST**

Pursuant to the Scheduling Order [Doc. No. 29], the following is Plaintiffs' Final

List of Exhibits:

<b>No.</b>	<b>Name and Address</b>	<b>Testimony</b>
1.	Certified copy of the policy issued to Plaintiffs by Defendant CSAA.	
2.	Defendant's Claim File, including CSAA_SMITH 001-202.	
3.	Defendant's Claim Guidelines.	
4.	Defendant's agent's file.	
5.	Defendant's underwriting file.	
6.	Defendant's annual statements.	
7.	Documents produced pursuant to Plaintiffs' Subpoenas Duces Tecum to Rimkus Consulting Group, Lisa Holliday, Stephen Ford, David Battle, Cindi Miles, and Tim France. Plaintiffs will produce when obtained.	
8.	Rimkus Engineering reports and financial information sought in Plaintiffs' Requests for Production Nos. 12 and 13.	
9.	General Guidelines for the Assessment and Report of Earthquake Damage in Residential Woodframe Buildings, CUREE Publication No. EDA-02.	
10.	Plaintiffs' repair invoices and estimates.	
11.	All documents produced by Plaintiffs, including SMITH 001-177.	

12.	Defendant's earthquake training materials.
13.	Defendant's earthquake claim handling guidelines.
14.	Photographs of Plaintiffs' home prior to the subject earthquake.
15.	Photographs of Plaintiffs' home post-earthquake that is the subject of this case.
16.	Photographs of Plaintiffs' home of claimed earthquake damage.
17.	Photographs and videos of damage to homes and commercial buildings in Cushing Oklahoma, as a result of the subject earthquake.
18.	News coverage and articles of damage to homes and commercial buildings in Cushing, Oklahoma, as a result of the subject earthquake.
19.	Documentation and information relating to Defendant's earthquake claims handling, training, and guidelines, its criteria for selecting engineers, and the applicability of the Unfair Claim Settlement Practices Act.
20.	Engineering reports by Lisa Holliday, Tim France, and other Rimkus engineers, and any supporting documentation, for those reports on other earthquake claims for Defendant or other insurance companies.
21.	Holliday 1-301
22.	RCG 001-301
23.	ZFI 1-105
24.	Miles 0001-0342
25.	Sean Wiley Rebuttal Expert Report
26.	All documents in Sean Wiley's possession pertaining to Plaintiffs' residence
27.	Correspondence exchanged between the parties regarding the claim which is the basis of this lawsuit.
28.	All CVs and Reports of any expert witness identified by Defendants.
29.	All documents Bates-stamped and exchanged in discovery not otherwise objected to be Plaintiffs.
30.	All depositions and deposition exhibits, except otherwise objected to by Plaintiffs.

31.	Any and all documentation received by Defendant in connection with the claim asserted under the policy, unless otherwise objected to by Plaintiffs.
32.	Documentation claimed in Defendant's privilege log.
33.	All verified Interrogatory Answers.
34.	Discoverable portions of Defendant's claim file relative to the property and claim which is the subject of this litigation.
35.	Any and all exhibits necessary for rebuttal.
36.	All exhibits listed by Defendant not otherwise objected to by Plaintiffs
37.	Plaintiffs reserve the right to supplement their Exhibit List as discovery progresses.

**MANSELL ENGEL & COLE**

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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2018, I electronically transmitted the attached document to the Clerk of the Court using the ECF system for filing and transmittal of a Notice of Electronic Filing to the following registrants:

Gerard F. Pignato ([jerry@pclaw.org](mailto:jerry@pclaw.org))

R. Greg Andrews ([greg@andrews.law](mailto:greg@andrews.law))

Dixie A. Craven ([dixie@pclaw.org](mailto:dixie@pclaw.org))

**ATTORNEYS FOR DEFENDANT –  
CSAA FIRE AND CASUALTY INSURANCE**

s/Adam M. Engel